

Remarks

Summary: This Amendment and Response amends the claims (except claim 16) to clarify the subject matter of the amended claims, and presents reasons why the now-amended previously rejected claims are patentable over the cited references.

Response To Paragraph 2 of the Office Action: The rejected claims have been amended to clarify the subject matter of the claims, consistent with what the drawings and specification enable one skilled in the art to practice. As to amended claims 1-7, the one or more apertures of the fluid-pressure platen zone are shown, for example, in Fig. 3B, see aperture near 116P. The one or more apertures of the fluid-bearing platen zone are shown, for example, in Fig. 3B, see aperture near 116B. The membrane is shown, for example, in Fig. 3A, see 130. The flow of fluid-bearing fluid is shown, for example, in Fig. 3C as 116B. The flexible movable second section (132P) of the membrane is shown in Fig. 3C moved up (extendable) into the flow 116B of fluid-bearing fluid. As to amended claims 6 and 7, the rejection recognized support for these fluid-pressure platen zones at page 2, last 2 lines, which are shown in Fig. 4B and described at paragraphs [0061] and [0062], for example. The defined cooperation (claim 6) of the membranes is described at page 33, paragraph [0063], lines 16-20, for example, and the separate extending of the membranes into the flow of the fluid-bearing fluid is described at page 33, paragraph [0063]. Consideration of amended claims 1-7 as being enabled by the drawings and specification is respectfully requested.

As to amended claims 8-13, as noted above, the rejection recognized support for the multiple fluid-pressure platen zones (page 2, last 2 lines). Each such zone is now defined as having a member and pocket, which are shown in Fig. 4B and

described at paragraphs [0061] and [0062], for example. The flexible pocket configuration is shown in Fig. 3C, for example, extending into the flow 116B of fluid-bearing fluid. As to amended claims 9-13, the amendments are consistent with the above text of amended claim 8. Consideration of amended claims 8-13 as being enabled by the drawings and specification is respectfully requested.

As to amended claims 18-20, the first aperture of the self-contained localized fluid-pressure platen zone is shown, for example, in Fig. 3B, see aperture near 116P. The second aperture of the fluid-bearing platen zone is shown, for example, in Fig. 3B, see aperture near 116B. The admitting of the fluid-bearing fluid is shown, for example, in Fig. 3B, see 126, and described with respect to Fig. 8 in paragraph [0070], for example. The admitting of the fluid-pressure fluid is shown, for example, in Fig. 3C as 116B, and the action of the localized fluid-pressure platen zone is via the flexible movable second section (132P) shown in Fig. 3C to limit the flow 116B of fluid-bearing fluid out of the platen. As to amended claims 19 and 20, the control is shown in Fig. 8, for example, and described at paragraph [0072], lines 14-22. Consideration of amended claims 18-20 as being enabled by the drawings and specification is respectfully requested.

Response To Paragraphs 4 and 7 of the Office Action: These paragraphs taken with paragraphs 8 and 9 indicate that the Office Action recognizes that the cited art does not show or suggest the combination in a platen of a fluid-bearing structure and a fluid-pressure structure, nor the related methods. For example, neither paragraph 4 nor paragraph 7 attributes that combination to the two cited references. On the other hand, the indicated allowability of claims 11-13, 15-17, and 20, and the statement of

reasons for allowance, indicate that the prior art does not teach or suggest that a free-flow tendency of the fluid-bearing fluid (e.g., through a gap) may be restricted by a reconfigured membrane, or by a membrane of the combined fluid-bearing structure and fluid-pressure structure.

It is respectfully submitted that each of the amended and pending claims 1-17 now sets forth an aspect of this combined fluid-bearing structure and fluid-pressure structure, or as to amended claims 18-20, sets forth a method aspect of this combined fluid-bearing operation and fluid-pressure operation, and allowance of these claims is respectfully requested.

In more detail, amended claims 1-7 define:

the membrane being configured so that in response to fluid of the respective at least one localized fluid-pressure platen zone, the membrane is extendable into the fluid-bearing fluid of the fluid-bearing platen zone

Without the combination of this fluid-bearing structure and fluid-pressure structure, the cited references do not teach or suggest the membrane being extendable into the fluid-bearing fluid of the fluid-bearing platen zone. Similarly, as to amended claim 3, for example, without the combination of this fluid-bearing structure and fluid-pressure structure, there is no second section of any bladder that extends into the flow of the fluid-bearing fluid of the fluid-bearing platen zone. Moreover, the separate Fig. 5 teaching in the '719 patent of only air pressure (and no bladder) teaches away from the combination of the Fig. 2-4 embodiments (bladders) with the claimed fluid-bearing, and indicates that the '719 patent fails to recognize the cooperation resulting from the claimed membrane being extendable into the fluid-bearing fluid of the fluid-bearing platen zone. Further, as defined in amended claim 6, for example, the claimed and above-noted free-flow tendency is not reduced by the bladder structures

of either the '858 nor '719 patents. Allowance of claims 1-7 is respectfully requested.

As to amended claims 8-13, the combination of this fluid-bearing structure and fluid-pressure structure is clearly set forth in terms of the more detailed:

the flexible pocket of each of the at least one fluid-pressure platen zones being configured to extend into the fluid-bearing fluid supplied from the fluid-bearing outlets

In reference to amended claim 9, for example, again the claimed and above-noted flow of the fluid-bearing fluid from the platen is not reduced by the bladder structures of either the '858 nor '719 patents. Further, with reference to amended claim 10, without the combination of this fluid-bearing structure and fluid-pressure structure, neither such cited reference teaches or suggests the claimed relative values of pressure of the respective fluid-bearing fluid and fluid-pressure fluid. Allowance of amended claims 8-10 is respectfully requested.

In detail as to amended claim 14, claim 14 now defines the combination of this fluid-bearing structure and fluid-pressure structure. The fluid-pressure structure includes both the apertures and a membrane for each fluid-pressure zone, with the fluid-bearing structure defined as:

the fluid-bearing structure being further configured with a second plurality of apertures for supplying fluid-bearing fluid between the respective membranes and the polishing pad.

Without the combination of this fluid-bearing structure and fluid-pressure structure, the cited references do not teach or suggest the combination that includes a second plurality of fluid-bearing apertures supplying fluid-bearing fluid as claimed between the membranes of the fluid-pressure platen zone and the polishing pad. Allowance of claim 14 is respectfully requested.

In detail as to amended claims 18-19, claim 18 now defines a combination of operations of both fluid-bearing and fluid-pressure. The operation of the fluid-pressure is in terms of:

providing the platen with a first aperture communicating with a self-contained localized fluid-pressure platen zone;

The operation of the fluid-bearing is in terms of:

providing the platen with a second aperture for defining at least one fluid-bearing platen zone;

Whereas the cited art teaches separately with respect to each such operation, amended claims 18 and 19 further define the cooperation of these two operations in terms of:

admitting fluid-bearing fluid into the second aperture, the fluid-bearing fluid tending to flow from the second aperture and out of the platen; and

admitting fluid-pressure fluid into the first aperture so that the self-contained localized fluid-pressure platen zone limits the flow of the fluid-bearing fluid out of the platen.

Without the combination of these claimed fluid-bearing and fluid-pressure operations, the cited references do not teach or suggest the claimed combination of operations that includes the first fluid-bearing aperture supplying the fluid-bearing fluid to the self-contained localized fluid-pressure platen zone, which **limits the flow of the fluid-bearing fluid out of the platen.** Allowance of amended claims 18 and 19 is respectfully requested.

Response To Paragraphs 8 and 9 of the Office Action: These paragraphs indicate that the Office Action recognizes that the cited art does not show or suggest the above-described combination in a platen of a fluid-bearing structure and a fluid-pressure structure, nor the related methods. Claims 11-13, and 20 have been amended to clarify the subject matter claimed. It is respectfully submitted that these amended

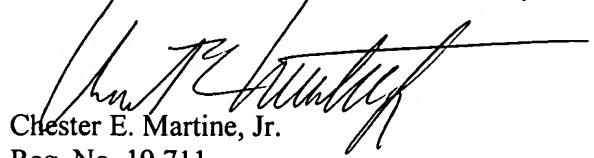
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claims continue to conform to the respective applicable statement set forth in paragraph 9 as a basis for patentability. Further, it is respectfully submitted that the amendments to claims 15-17 also still conform to the respective applicable statement set forth in paragraph 9 as a basis for patentability. For example, please see claim 11 and the pressure values; claim 12 and the restricted free-flow; and claim 13 and the deforming of each member (membrane) into the fluid-bearing gap to restrict the tendency of the fluid-bearing fluid to freely-flow in the fluid-bearing gap. Additionally, please see claim 15 and the defined gap referencing free-flow of the fluid-bearing, and each of the membranes restricting the gap; and claim 16, in which each sealed membrane becomes inflated to extend across the gap to limit the flow of the fluid-bearing fluid. Similarly, claim 17 continues to define each reconfigured membrane as previously claimed. Continued allowance of claims 11-13, 15-17, and 20 is respectfully requested.

Should the Examiner have any questions concerning this Application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,

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